

EXHIBIT 3

In the Matter Of:

NEW ENGLAND COMPOUNDING PHARMACY INC. PRODUCTS LIABILITY

VIDEOTAPED DEPOSITION OF SCOTT BUTLER

September 17, 2015



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1 MR. TARDIO: Rome.

2 BY MR. GASTEL:

3 Q. Rome; I'm sorry.

4 A. She's still providing services there.

5 Q. How did --

6 A. She's no longer employed by CPS.

7 Q. Okay. Is Dr. Dickerson still providing
8 clinical services?

9 A. I don't know.

10 Q. I'll hand you a document that we'll mark as
11 599, sir.

12 (Exhibit No. 599 was marked.)

13 MR. GASTEL: It's 599, right?

14 COURT REPORTER: Yes.

15 BY MR. GASTEL:

16 Q. Are you familiar with this document, sir?

17 A. Yes.

18 Q. Is this the organizational chart for Howell
19 Allen Clinic?

20 A. Yes.

21 Q. Looks like Dr. Lanford is president of Howell
22 Allen Clinic?

23 A. Yes.

24 Q. And that's the Dr. Lanford that sits on the
25 center's board?

1 A. Yes.

2 Q. And the board of directors is all the
3 shareholders that are listed here in the bottom
4 left-hand corner, correct?

5 A. Yes.

6 Q. Is this a true and accurate organizational
7 chart for Howell Allen Clinic in 2012?

8 A. I think there might be additional Howell Allen
9 shareholders who are not listed on this document.

10 Q. In 2012?

11 A. They -- they were employees of Howell Allen;
12 they were not shareholders in 2012.

13 Q. And this is probably me just not following you,
14 sir, but I'm a little confused.

15 Are you saying that the shareholder list here
16 is over-encompassing for what the shareholders were in
17 2012?

18 A. No. I'm saying that there were additional
19 doctors in the group that were not yet shareholders that
20 are not listed on the document.

21 Q. Okay. So is this an accurate list of the
22 shareholders in 2012?

23 A. Yes.

24 Q. And now there are additional shareholders
25 who --



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1 A. Yes.

2 Q. Let me finish my question, sir, but I
3 appreciate you anticipating it.

4 But now there are -- there are additional
5 shareholders of Howell Allen Clinic that were in 2012
6 employed as physicians of Howell Allen Clinic but were
7 not yet shareholders of Howell Allen Clinic.

8 A. Yes.

9 Q. Who are the additional shareholders of Howell
10 Allen Clinic not listed here?

11 A. Richard Lebow, L-e-b-o-w, and Adam Reig,
12 R-e-i-g.

13 Q. R-e-i-g, sir?

14 A. Yes. And then Dr. Everette Howell has retired.

15 Q. And then did he give up his shareholder
16 interest in the organization?

17 A. Yes.

18 Q. Is Dr. Everette Howell the Howell in Howell
19 Allen?

20 A. Yes.

21 Q. And Dr. Vaughan Allen is the Allen in Howell
22 Allen?

23 A. Yes.

24 Q. Is Dr. Allen still practicing medicine?

25 A. Yes.



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